

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

HEATHER HANNA	§	
	§	
v.	§	Civil Action No. 4:17-cv-03912
	§	
WELLS FARGO BANK, N.A.	§	

**JOINT STIPULATION TO ARBITRATE
CLAIMS AND REQUEST FOR DISMISSAL**

Defendant, Wells Fargo Bank, N.A. ("Wells Fargo"), and Plaintiff, Heather Hanna ("Plaintiff") (collectively, the "Parties"), file this Joint Stipulation to Arbitrate Claims and Request for Dismissal, respectfully stating as follow:

1. Plaintiff commenced this action by filing a Complaint against Wells Fargo on December 29, 2017. *See* doc. 1.
2. The Parties have since agreed to arbitrate all claims in this case pursuant to the express terms of the credit account agreement, out of which the subject of the Complaint filed in this matter arises.
3. The Parties, through their respective counsel of record, stipulate and agree to the terms as follows:
 - a. The parties shall submit to binding non-judicial arbitration;
 - b. The arbitration shall be conducted through American Arbitration Association ("AAA");

- c. This case shall be dismissed without prejudice pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), and each Party shall bear its own attorneys' fees and costs as to this federal court action;
- d. Plaintiff will initiate arbitration with AAA according to the Rules set forth by the AAA for Consumer Arbitration;
- e. In all other respects, both parties explicitly agree to arbitrate this dispute consistent with the rules of the dispute forum.

WHEREFORE, PREMISES CONSIDERED, the Parties respectfully request that this Court enter their proposed Order, which is being submitted contemporaneously with this Joint Stipulation to Arbitrate Claims and Request for Dismissal.

Dated: February 6, 2018.

Respectfully submitted,

/s/ Adam T. Hill

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**ATTORNEYS FOR DEFENDANT
WELLS FARGO BANK, N.A.**

CERTIFICATE OF SERVICE

I hereby certify that on February 6, 2018, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

/s/ Brian Vanderwoude

J. Brian Vanderwoude